## **DOCKET SECTION**

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TREWORGY TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T22-12)

The United States Postal Service hereby provides the response of witness

Treworgy to the following interrogatory of the Office of the Consumer Advocate:

OCA/USPS\_T22\_12. Presiding Officer's Ruling No. R97-1\40 specified October 17

as the date for filing this response.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3083; Fax –5402 October 17, 1997

<sup>&</sup>lt;sup>1</sup>Presiding Officer's Ruling No. R97-1 also addressed responses to three parts of interrogatory OCA/USPS-T22-20. A motion for extension of time to file those responses is being filed contemporaneously with this response.

## U.S. POSTAL SERVICE WITNESS DAVID E. TREWORGY RESPONSE TO PRESIDING OFFICER'S RULING NO. R97-1/40

Page 1 of 1

OCA/USPS-T22-12. Please refer to your Worksheet C-1 and C-2, concerning the scanning infrastructure capital and program costs and the distribution key for volume variable costs. Please update your Worksheet C-1 and C-2 to reflect the \$218 million contract awarded to Lockheed Martin.

### **RESPONSE:**

Pursuant to Presiding Officer's Ruling No. R97-1/40, updated Worksheets C-1 and C-2 are attached.

### Worksheet C-1 (revised in response to Presiding Officer's Ruling No. R97-1/40)

## Scanning Infrastructure Capital and Program Costs

\$166,151.5

(in thousands)

	Test year		Volume variable with respect to	
Capital costs	costs 1	Attribution of costs del	lvery confirmation	Distribution of costs
Information systems	\$14,886.4	Not volume variable	\$0.0	No attributable costs to distribute
Carrier scanners	\$25,763.1	Variable with overall carrier cost system (CS 6, 7, and 10)	\$25,763.1	Overall carrier cost system (CS 6, 7, and 10
Box section scanners	\$4,099.2	Not volume variable	\$0.0	No attributable costs to distribute
Support for carrier scanners	\$97.9	Variable with overall carrier cost system (CS 6, 7, and 10)	\$97.9	Overall carrier cost system (CS 6, 7, and 10
Support for box section scanners	\$15.6	Not volume variable	\$0.0	No attributable costs to distribute
Miscellaneous	\$1,058.7	Not volume variable	\$0.0	No attributable costs to distribute
Total capital costs	\$45,920.9		\$25,861.0	
	Test year	Addally day of south	with respect to	
Program costs	costs 1	Attribution of costs del	ivery confirmation	Distribution of costs
Program costs Information systems	\$64,723.5	Not volume variable	ivery confirmation \$0.0	Distribution of costs  No attributable costs to distribute
_ <u>~_~</u>				
Information systems	\$64,723.5	Not volume variable	\$0.0	No attributable costs to distribute
Information systems Carrier scanner suppport and maintenance	\$64,723.5 \$9,259.7	Not volume variable  Variable with overall carrier cost system (CS 6, 7, and 10)	\$0.0 \$9,259.7	No attributable costs to distribute Overall carrier cost system (CS 6, 7, and 10
Information systems Carrier scanner suppport and maintenance Box section scanner support and maintenance	\$64,723.5 \$9,259.7 \$1,473.3	Not volume variable  Variable with overall carrier cost system (CS 6, 7, and 10)  Not volume variable	\$0.0 \$9,259.7 \$0.0	No attributable costs to distribute  Overall carrier cost system (CS 6, 7, and 10)  No attributable costs to distribute
Information systems Carrier scanner suppport and maintenance Box section scanner support and maintenance Call center development	\$64,723.5 \$9,259.7 \$1,473.3 \$183.2	Not volume variable Variable with overall carrier cost system (CS 6, 7, and 10) Not volume variable Not volume variable	\$0.0 \$9,259.7 \$0.0 \$0.0	No attributable costs to distribute Overall carrier cost system (CS 6, 7, and 10) No attributable costs to distribute No attributable costs to distribute

\$35,120.7

#### Notes

Total capital and program costs

<sup>&</sup>lt;sup>1</sup> USPS Marketing Department.

Worksheet C-2 (page 1 of 2) revised in response to Presiding Officer's Ruling No. R97-1/40

# Distribution Key for Volume Variable Scanning Infrastructure Capital and Program Costs (In thousands)

Rate category			Total CS 6, 7, & 10	Distribution key	Distributed amount
	CS 6 & 7 1	CS 10 <sup>1</sup>			
First-Class Mail:					
Letters & parcels	1,873,760	296,468	2,170,228	14.63%	\$5,136.6
Presort Itr & parcel	1,018,479	263,567	1,282,046	8.64%	\$3,034.4
Single piece cards	89,369	19,248	108,617	0.73%	\$257.1
Presort prvt p cs	36,403	11,053	47,456	0.32%	\$112.3
Total First	3,018,011	590,336	3,608,347	24.32%	\$8,540.4
Priority Mail	107,436	12,979	120,415	0.81%	\$285.0
Express Mail	21,374	4,729	26,103	0.18%	<b>\$</b> 61.8
Mailgrams	166	11	177	0.00%	\$0.4
Second-class mail:					
Within county:	23,499	13,610	37,109	0.25%	\$87.8
Outside county:					
Reg rate pub	223,671	108,288	331,959	2.24%	<b>\$</b> 785.7
Nonprofit pub	59,62 <b>4</b>	34,191	93,815	0.63%	\$222.0
Classroom pub	1,856	913	2,769	0.02%	\$6.6
Total Second	308,650	157,002	465,652	3.14%	\$1,102.1
				0.00%	
Third-class mail:					
Single plece rate	25,799	1,149	26,948	0.18%	<b>\$</b> 63.8
Bulk rate-reg					
Car presort	716,279	259,640	975,919	<sup>-</sup> 6.58%	\$2,309.9
Other	809,641	304,392	1,114,033	7.51%	\$2,636.8
Total regular	1,525,920	564,032	2,089,952	14.08%	\$4,946.6
Bulk rate- nonprof					
Car presort	46,962	13,834	60,796	0.41%	\$143.9
Other	191,940	70,010	261,950	1.77%	\$620.0
Total nonprof	238,902	83,844	322,746	2.18%	\$763.9
Total Third	1,790,621	649,025	2,439,646	16. <b>44</b> %	\$5,774.3

Worksheet C-2 (page 2 of 2) revised in response to Presiding Officer's Ruling No. R97-1/40

# Distribution Key for Volume Variable Scanning Infrastructure Capital and Program Costs (in thousands)

Rate category	CS 6 & 7	CS 10	Total CS 6, 7, & 10	Distribution key	Distributed amount
Parcel zone rate	42,935	9,804	52,739	0.36%	\$124.8
Bound prnt matter	51,222	10,381	61,603	0.42%	\$145.8
Spc 4th-cl. rate	27,690	5,199	32,889	0,22%	\$77.8
Library rate	4,585	1,243	5,828	0.04%	\$13.8
Total Fourth	126,432	26,627	153,059	1.03%	\$362.3
US Postal Service	13,403	1,537	14,940	0.10%	\$35.4
Free mail	3,222	671	3,893	0.03%	\$9.2
International mail	23,043	2,585	25,628	0.17%	\$60.7
Total All Mail	5,412,358	1,445,502	6,857,860	46.22%	\$16,231.6
Special services:					
Registry	7,042	2,335	9,377	0.06%	\$22.2
Certified	93,596	54,058	147,654	1.00%	\$349.5
Insurance	2,581	2,738	5,319	0.04%	\$12.6
COD	2,799	3,874	6,673	0.04%	\$15.8
Special delivery	644	219	863	0.01%	\$2.0
Money orders	0	1,233	1,233	0.01%	\$2.9
Stamped envelopes	0	0	0	0.00%	\$0.0
Special handling	0	0	0	0.00%	\$0.0
Post office box	329	0	329	0.00%	\$0.8
Other	7,971	26	7,997	0.05%	\$18.9
Total Spc Svcs	114,962	64,483	179,445	1.21%	\$424.7
Attributable	5,527,320	1,509,985	7,037,305	47.43%	\$16,656.3
Other	5,934,155	1,867,077	7,801,232	52,57%	\$18,464.4
Total Costs	11,461,475	3,377,062	14,838,537	100.00%	\$35,120.7

Notes

<sup>&</sup>lt;sup>1</sup> See USPS-T-5, Workpaper B.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 October 17, 1997